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COMMUNITY LOAN SERVICING, LLC  
FKA BAYVIEW LOAN SERVICING, LLC,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 3:21-cv-00154-MMD-WGC

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 12] AND MOTION FOR FEES  
AND COSTS [ECF No. 13]**

**(Second Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Community  
2 Loan Servicing, LLC fka Bayview Loan Servicing, LLC (“Bayview”) (collectively, the “Parties”),  
3 by and through their counsel of record, hereby stipulate and agree as follows:

- 4 1. On March 8, 2021, Bayview filed its Complaint in the Second Judicial District Court,  
5 Case No. CV21-00397 [ECF No. 1-1];
- 6 2. On April 5, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.  
7 1];
- 8 3. On May 5, 2021, Bayview filed a Motion for Remand [ECF No. 12] and Motion for  
9 Costs and Fees [ECF No. 13];
- 10 4. On May 19, 2021, the Court granted the parties’ request to extend the deadline for  
11 Chicago Title to respond to Bayview’s Motion for Remand and Motion for Costs and  
12 Fees;
- 13 5. Chicago Title’s deadline to respond to Bayview’s Motion for Remand and Motion for  
14 Costs and Fees is June 18, 2021;
- 15 6. Chicago Title’s counsel is requesting an extension until July 9, 2021, to file its  
16 response to the pending Motion for Remand and Motion for Costs and Fees;
- 17 7. Chicago Title requests another extension of time to respond to the Motion for Remand  
18 and Motion for Costs and Fees to afford Chicago Title additional time to respond to  
19 the legal arguments set forth in Bayview’s motions;
- 20 8. Bayview does not oppose the requested extension;
- 21 9. This is the second request for an extension which is made in good faith and not for  
22 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Bayview's Motion  
2 for Remand [ECF No. 12] and Motion for Costs and Fees [ECF No. 13] is hereby extended  
3 through and including July 9, 2021.  
4

5 Dated: June 16, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
8 Attorneys for Defendant CHICAGO TITLE  
9 INSURANCE COMPANY

10 Dated: June 16, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

14 Dated: June 16, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Darren T. Brenner  
16 DARREN T. BRENNER  
17 Attorneys for Plaintiff COMMUNITY LOAN  
SERVICING, LLC FKA BAYVIEW LOAN  
18 SERVICING, LLC

19 **IT IS SO ORDERED:**

20  
21 Dated: June 17, 2021

By:   
22 UNITED STATES DISTRICT COURT JUDGE  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

